

AO 91 (Rev. 11/11) Criminal Complaint

FELONY

UNITED STATES DISTRICT COURT

for the

Southern District of TexasUnited States Courts
Southern District of Texas
FILED

February 14, 2025

Nathan Ochsner, Clerk of Court

United States of America
v.

Case No. 1:25-MJ-144

Leonardo BAEZ and Nora Alicia AVILA-GUEL

Defendant(s)

SEALED

PUBLIC AND UNOFFICIAL STAFF ACCESS
TO THIS INFORMATION ARE
PROHIBITED BY COURT ORDER.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 12, 2025 in the county of Cameron in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. 1324(a)(1)(A)(iii) and
(v)(II)Bringing in and harboring certain aliens and aiding and abetting the
harboring of aliens.

This criminal complaint is based on these facts:

See attachment.

☒ Continued on the attached sheet.Dillon Duke

Complainant's signature

Dillon Duke HSI Special Agent

Printed name and title

☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed
electronically pursuant to Fed.R.Crim4.1.Date: February 14, 2025City and state: Brownsville, TexasIgnacio Tortosa III
Judge's signature

Ignacio Tortosa III, U.S. Magistrate Judge

Printed name and title

Attachment A

Leonardo BAEZ (COC/N: Mexico; DOB: [REDACTED] 1969) and Nora Alicia AVILA-GUEL (COC/N: Mexico; DOB: [REDACTED] 1978), Lawful Permanent Residents of the United States, were encountered by Homeland Security Investigations on February 12, 2025 at Abby's Bakery located in Los Fresnos, TX. Leonardo BAEZ and Nora Alicia AVILA-GUEL identified themselves as the owners and operators of Abby's Bakery. During the encounter eight (8) illegal aliens were located, identified, and apprehended at Abby's Bakery. Both Leonardo BAEZ and Nora Alicia AVILA-GUEL admitted they knew the aliens were unlawfully present in the United States in violation of law, and they harbored the aliens in their personally owned property.

Material witness #1, Roberto IBARRA OTERO, is a citizen and national of Mexico with no documents to remain in the United States. Material witnesses #1 stated that the owners of Abby's Bakery were aware of his unlawful status in the country and willfully harbored them on the property. Material Witnesses #1 positively identified both BAEZ and AVILA-GUEL as the owners of Abby's Bakery and the individuals who harbored him and others.

Material witness #2, Gerardo SANCHEZ MARTINEZ, is a citizen and national of Mexico with no documents to remain in the United States. Material witnesses #2 stated that the owners of Abby's Bakery were aware of his unlawful status in the country and willfully harbored him on the property. Material Witnesses #2 positively identified both BAEZ and AVILA-GUEL as the owners of Abby's Bakery and the individuals who harbored him and others.

The apprehension of the aliens was the result of a worksite enforcement action. Post event, the facts of the event were presented to the duty AUSA, who agreed there was sufficient cause for a complaint for harboring and accepted prosecution.

Sworn to telephonically and signed
electronically pursuant to Fed.R.Crim4.1.

Date: February ¹⁴~~12~~, 2025

City and State: Brownsville, Texas

Dillon Duke

Dillon Duke, Special Agent
Homeland Security Investigations


Ignacio Torteya III, U.S. Magistrate Judge